

The Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOSEPH A. KENNEDY,

Plaintiff,

v.

BREMERTON SCHOOL DISTRICT,

Defendant.

NO. 3:16-cv-05694-RBL

DECLARATION OF MICHAEL B.
TIERNEY IN OPPOSITION TO
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION

NOTED ON MOTION CALENDAR:
September 16, 2016

I, Michael B. Tierney, declare the following to be true under penalty of perjury under the laws of the State of Washington.

1. I am the attorney for Bremerton School District in the above-captioned action, am over the age of 21, and make this declaration based upon personal knowledge.

2. Attached hereto as exhibits are true and correct copies of the following documents:

No.	Description
Exhibit 1	Photo of Kennedy Prayer Group on October 16, 2015

DECL. OF MBT - 1
(3:16-cv-05694-RBL)

TIERNEY & BLAKNEY, PC
2955 80th Avenue SE, Suite 102
Mercer Island, WA 98040
206-232-3074 (Phone)
206-232-3076 (Fax)

Exhibit 2	Photo of Kennedy Prayer Group on October 29, 2015
Exhibit 3	Photo of Satanist Group Outside Bremerton High School Football Field
Exhibit 4	Coach and Volunteer Coach Agreement signed October 5, 2015
Exhibit 5	Notification of Reasonable Assurance signed October 5, 2015
Exhibit 6	Assistant Coach Responsibilities
Exhibit 7	Head Coach Responsibilities
Exhibit 8	Kennedy Evaluation by Head Coach signed November 14, 2015
Exhibit 9	Kennedy Evaluation by Athletic Director signed December 16, 2015
Exhibit 10	Letter to EEOC from Jeff Ganson dated April 6, 2016
Exhibit 11	Email to Jeff Barton and John Polm from Aaron Leavell dated September 18, 2015
Exhibit 12	Letter to Kennedy from Bremerton School District dated September 17, 2015
Exhibit 13	Letter to Bremerton School District from Pl. Counsel Hiram Sasser dated October 14, 2015
Exhibit 14	Letter to Kennedy from Bremerton School District dated October 23, 2015
Exhibit 15	Letter to Kennedy from Bremerton School District dated October 28, 2015

Signed at Mercer Island, Washington this 12th day of September, 2016

By: /s/Michael B. Tierney
Michael B. Tierney, WSBA #13662
Attorney for Defendant Bremerton School District

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington, I caused the original of the foregoing document to be filed with the Clerk of the Court via electronic filing, who will send notification of filing as follows:

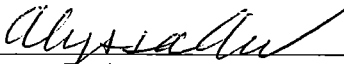
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DATED this 12th day of September, 2016 at Mercer Island, Washington.


Alyssa P. Au
Tierney & Blakney, P.C., Legal Assistant